

DECLARATION 1

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:

Application of BellSouth Corporation,
BellSouth Telecommunications, Inc.,
and BellSouth Long Distance, Inc.,
for Provision of In-Region, InterLATA
Services in Louisiana

CC Docket No. 97-231

**DECLARATION OF BETTY BAFFER
ON BEHALF OF LCI INTERNATIONAL TELECOM CORP.**

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of:

Application of BellSouth Corporation,
BellSouth Telecommunications, Inc.,
and BellSouth Long Distance, Inc.,
for Provision of In-Region, InterLATA
Services in Louisiana

CC Docket No. 97-231

**DECLARATION OF BETTY BAFFER
ON BEHALF OF LCI INTERNATIONAL TELECOM CORP.**

I, Betty Baffer, do hereby declare and state:

1. I am employed by LCI International Telecom Corp. ("LCI") as a Business Analyst for LCI's Local Services Division. In this job, I am the Local Services Division's liaison with BellSouth and I am responsible for working with BellSouth to resolve issues raised by LCI's local operations center and customer service group. I am LCI's designated point of contact with BellSouth for issues and problems concerning LCI's local exchange service business in BellSouth's region. I have worked in the telecommunications and related industries for six years.

2. LCI signed a resale agreement with BellSouth on February 6, 1997 covering all of the states in BellSouth's region. LCI placed its first resale order with BellSouth in early April 1997, and over the past six months, has gradually expanded its business into Georgia, Florida, Tennessee, North Carolina and Kentucky. Currently, LCI's customer base consists mostly of small businesses, typically with

five to 20 lines. LCI also has plans to expand its local services business into other states in BellSouth's region, including Louisiana.

3. Since LCI began reselling service in BellSouth's region, BellSouth has failed to provide LCI with parity of access to the major functions of its operation support systems ("OSS"), including pre-ordering, ordering, provisioning, and billing. LCI's experiences in that regard in Georgia and other BellSouth states is relevant to Louisiana because BellSouth has adopted the same processes and procedures for access to its OSS across its entire region. Moreover, BellSouth has established region-wide service centers, one being located in Birmingham, Alabama, that provision orders from CLECs such as LCI, no matter in which state the order is generated.

4. Until recently, BellSouth did not have any type of electronic interface by which LCI could access the pre-ordering functions of BellSouth's OSS. LCI was forced to conduct its pre-ordering via facsimile and to retrieve customer service records ("CSR") manually. These manual processes caused LCI serious delays in obtaining CSRs and getting orders provisioned.

5. The electronic interface known as "LENS" that BellSouth recently made available to CLECs for pre-ordering functions also has serious limitations. One of its major deficiencies is that it is not integrated with any of the other electronic interfaces BellSouth provides, including its EDI interface. Thus, the information that LCI enters into and obtains from LENS when conducting pre-ordering activities cannot be automatically imported into the EDI application for purposes of placing an order. LCI has to re-key that information to place even the simplest of orders, which I do not believe BellSouth representatives have to do when they conduct pre-ordering and ordering activities for their retail operations. LCI also has to re-key this same information into its own back-office systems, which is extremely inefficient and creates a further risk that the information in BellSouth's systems will not match that which has been entered into LCI's systems.

6. In August of 1997, LCI began using BellSouth's EDI interface for ordering and provisioning functions. However, LCI has been having so many problems with the orders that have been placed over that interface that LCI recently abandoned use of that interface and returned to placing orders manually, via facsimile. The problems that LCI has experienced with BellSouth's EDI system are described in more detail in the declaration of Beth Rausch. These problems have been addressed in letters I sent to BellSouth on September 18, 1997 and November 18, 1997, true and correct copies of which are attached hereto as Exhibit A.

7. One of the problems identified in my September 18, 1997 letter is the substantial number of LCI orders that were falling out to manual processing at BellSouth once those orders were transmitted electronically over the EDI interface. In several telephone calls with BellSouth representatives, we have received conflicting information on the circumstances that cause an order to fall out for manual processing. We have requested, but not yet received, any written clarification from BellSouth on this issue. Based on our experiences to date, we believe that a substantial percentage of LCI's EDI orders have fallen out to manual processing, which explains the delays we experienced in the provisioning of orders.

8. Unless BellSouth's EDI interface provides electronic flow-through for a substantial percentage of LCI's orders, LCI will not have parity of access to BellSouth's OSS.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. Executed this 25th day of November, 1997 at McLean, Virginia.


Betty Baffer

A

EXHIBIT A



September 18, 1997

Ken Enman
1 Chase Corp. Dr.
Suite 350
Birmingham, AL 35203

VIA FAX: 205-444-0833

Dear Ken:

Thank you for attending the EDI conference call meeting on September 10. I've sent minutes from the meeting under separate cover. I am writing you this letter to follow up on several EDI-related items, and insofar as these are matters of BellSouth policy, I am addressing them with you as a representative of our account management team.

Lack of flow-through for EDI orders

According to our discussion during the conference call, there are circumstances where LCI's EDI orders would "drop out" of BellSouth's electronic systems and would be worked manually by BellSouth representatives. For example, EDI orders requiring clarification (i.e. clarification notices) will drop out of BellSouth's electronic system; the notices will be generated manually; and they will be faxed to LCI by BellSouth representatives. It was also stated that if BellSouth has made an error on an order or if there are problems with BellSouth's systems, EDI orders would be processed manually.

LCI requests that BellSouth advise us in writing of all circumstances in which an EDI order would not have full electronic flow-through. This information was requested during our meeting, but despite much discussion among the BellSouth representatives at the meeting, it was not provided. This information is needed because, among other reasons, there appears to be disagreement among BellSouth representatives as to which types of orders require manual processing. For example, several BellSouth representatives said that any order with six or more lines would be worked manually, while other BellSouth representatives disagreed. Beth Rausch had been told by BellSouth in a previous discussion that any order with more than one line would be worked manually. We request that BellSouth settle this confusion, and provide LCI with a full description of all order types that will fall out to manual processing.

We disagree with the statement made by BellSouth during the meeting that LCI should not be concerned if orders are being worked manually since the process is transparent to LCI. Past experience has proven that manual processing of orders is unreliable and increases provisioning intervals. Moreover, LCI developed its EDI system with the understanding that BellSouth would offer us a seamless, timely, and fully-automated system. Under current operating procedures EDI offers us little advantage over manual processing because the clarification notice process will be handled exactly the same way in EDI environment as it is in the manual environment. LCI is also entitled to this information because it is directly relevant to the issue of parity of access to BellSouth's OSS. This was recently recognized by the FCC in its order rejecting Ameritech's Section 271 application. One of the reasons for that rejection was Ameritech's reliance on manual processing of orders.

Finally, we request that BellSouth advise us in writing of any existing plans to achieve full electronic flow-through for any order types that currently fall out to manual processing, including current implementation schedules.

Jeopardy Notification Process is Insufficient

BellSouth's policy for jeopardy notification is unacceptable. Currently, BellSouth will notify LCI by a phone call if, for any reason, the service date for an LCI customer cannot be met. BellSouth can make this call at anytime up to, and including, the date that service is due.

Among other things, our customers plan office moves around the due dates provided to us by BellSouth. The current jeopardy notification practice does not give our customers sufficient time to make alternative arrangements for their businesses. This reflects unfavorably on LCI. In addition, a telephone call provides no evidence that a jeopardy notice was served. We need a more reliable record of the notification

We, therefore, request that jeopardy notices be required prior to the due date, and that jeopardy notices be sent to us via EDI.

Problems with TrustedLink

The software package, TrustedLink, was offered to LCI and other CLECs as a means to use EDI processing without having to devote a lot of time and resources into software development. Unfortunately, this has not been the case.

A considerable amount of LCI's time and resources have been spent in efforts to correct deficiencies in the TrustedLink program. Although some of the problems have now been corrected, LCI believes that this was due to efforts initiated by LCI, and that BellSouth did not adequately test this software prior to offering it to CLECs. What has happened in many cases is that LCI has come up with ways to work around software problems. These work arounds involve tedious processes and make it impossible to easily train new users on the software.

In addition, the LCI order entry personnel who attended BellSouth's Trusted Link training were not trained using live EDI transactions or real-world EDI scenarios. This inadequate training left them poorly prepared when they encountered general fault protections and data formatting problems in submitting live EDI orders, as these problems had not occurred in training.

BellSouth Representatives Are Not Trained in EDI Order Processing

Our initial attempts to submit orders via EDI have been fraught with problems due largely to what appears to be the inexperience of the BellSouth representatives handling the orders.

By way of illustration, Beth Rausch submitted a batch of EDI orders on August 27th. She did not receive 855s or 865s from BellSouth for seventeen of the orders that were submitted that day. On August 28th and 29th she made phone calls to BellSouth but could not find an authoritative source who could give her the status of the orders. She spoke to a BellSouth representative, who had been named as our single

point of contact for EDI matters. At that time, this person had not even been made aware that she was responsible for providing LCI with EDI support. On September 9th, Beth Rausch finally got answers from service representatives at the LCSC, and found out that the service representatives were misinformed with regard to EDI capabilities. LCSC representatives had assumed that the information they typed in the "comments" section on each order was visible to LCI through EDI. This is not the case. Due to this error, seventeen orders for LCI customers were delayed. Unfortunately, this delay is not an isolated occurrence. Today, a list of nineteen EDI orders for which we have received neither 855s or 865s is being sent to BellSouth for resolution.

We were told during the conference call that the BellSouth staff has now been trained in EDI order processing. We hope that these assurances hold true, as we cannot continue to have our orders delayed.

Very truly yours,

A handwritten signature in cursive script that reads "Betty Baffer".

Betty Baffer
LCI International

Cc: Susan Lewis (BellSouth)
Odin Moody (LCI)



November 18, 1997

Susan Lewis
BellSouth Interconnection Services
1 Chase Corp. Drive
Suite 350
Birmingham, AL 35203

Via facsimile

Dear Susan:

I am writing to inform you that due to the serious problems with BellSouth's EDI system and a lack of adequate system support, LCI has been forced to discontinue the use of BellSouth's EDI for order processing.

By this letter, I am requesting that BellSouth and LCI join forces to remedy the problems that we have been encountering so that LCI can quickly resume use of EDI. We have attempted to resolve problems through conference calls, telephone conversations and letters, but these have not proven successful. Therefore, I am requesting that we convene a meeting between BellSouth and LCI to develop an action plan to remedy the numerous problems that LCI has encountered to date.

I have written two letters (dated 9/11/97 and 9/18/97) that illustrate some of LCI's problems with BellSouth's EDI performance. These problems include:

- Lack of adequate documentation
- Bell South's inability to agree internally on business rules
- Lack of system support
- Lack of EDI Subject Matter Expert
- Lack of Flow Through capability

As a result of these problems, LCI's EDI orders are not being filled on a consistent or timely basis. This directly impacts service to our customers.

Attached to this letter is a case-by-case analysis and summary of all the orders we have submitted via EDI. As you can see, of the orders we submitted in October, we received 855s on only 34% of our orders and 865s on only 49% of our orders.

On those orders where BellSouth did not provide us an 855 or 865, we encountered numerous problems that required substantial and time-consuming investigative work by our provisioners. For example, some of the orders were "lost" in BellSouth's system. Although BellSouth's EDI specialists could apparently see the orders in the system, the LCSC staff could not. After several unsuccessful telephone calls to BellSouth attempting to resolve this problem, we finally resorted

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to resubmitting these orders via facsimile. For other orders, BellSouth told us they had been sent to clarification, but we never received faxed clarification notices, and BellSouth could not confirm that the clarification notices were sent.

Of the orders that actually flowed through the system in October, we experienced an average 2.7 day turn-around to receive an 855. This 2.7 day turn-around exceeds the 24 hour interval commitment BellSouth made to us in the September 10 meeting, nevertheless, it is better than the interval time we experience in the manual environment.

Please share this letter, our concerns, and this request, with the appropriate people at BellSouth, and let me know before the end of the week when we can go forward with our plans to devise a strategy that will improve EDI performance. LCI is eager to see BellSouth resolve the problems with its EDI interface so that LCI can begin using that interface as soon as possible.

Thank you for your prompt attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Betty Baffer". The signature is written in a cursive, flowing style.

Betty Baffer
LCI International

cc: Wayne Charity
Jim Taylor
Odin Moody

LCI International
BellSouth EDI Analysis

	850 Sent	855 Rec'd	865 Rec'd	Days to 855	Days to 865	Workdays to 855	Workdays to 865	Desired Due Date	855 Late Work Days	
4236886622	08/28/97	9/3/97	9/10/97	5	12	4	9	09/02/97	3	
34887741	08/29/97	09/10/97	9/10/97	11	11	8	8	09/03/97	7	
34906054	08/29/97	09/03/97	9/10/97	4	11	3	8	09/03/97	2	
34906087	08/29/97	09/10/97	9/10/97	11	11	8	8	09/03/97	7	
4046362620	08/29/97	9/3/97	9/10/97	4	11	3	8	09/03/97	2	
4236806596	08/29/97	9/3/97	9/12/97	4	13	3	10	09/03/97	2	
7704916842	08/29/97	9/10/97	9/10/97	11	11	8	8	09/03/97	7	
34794284A	08/27/97	09/03/97	9/3/97	6	4	5	5	08/29/97	4	
34794284B	08/27/97	09/03/97	9/3/97	6	4	5	5	08/29/97	4	
34870434	09/03/97									Clarification, customer disconnected, returned to sales
34888481	09/03/97	09/10/97	9/12/97	7	9	5	7	09/11/97	4	
34928215	09/03/97	9/10/97	9/17/97	7	14	5	10	09/11/97	4	
34730580	09/09/97							09/13/97		Verbal FOC, 10-5-97
3486622	09/13/97	09/18/97	9/22/97	5	9	3	5	09/17/97	2	
30365298	09/13/97	09/17/97	9/18/97	4	5	2	3	09/17/97	1	
34786632	09/13/97	09/18/97	9/22/97	5	9	3	5	09/17/97	2	
34794284	09/13/97		9/23/97		10		6	09/16/97		
34794749	09/13/97		10/6/97		23		15	09/17/97		
34872151	09/13/97	10/06/97	10/7/97	23	1	15	16	09/17/97	14	
4045299333	09/13/97	9/17/97	9/18/97	4	5	2	3	09/17/97	1	
4070488283	09/13/97	9/22/97	9/23/97	9	10	5	6	09/17/97	4	
4073245884	09/13/97	9/17/97	9/18/97	4	5	2	3	09/17/97	1	
7043331188	09/13/97	9/17/97	9/18/97	4	5	2	3	09/17/97	1	
9544899020	09/13/97	9/17/97	9/18/97	4	5	2	3	09/17/97	1	
9544915254	09/13/97	9/17/97	9/18/97	4	5	2	3	09/17/97	1	
9108560796	09/16/97	9/18/97	9/23/97	2	7	2	5	09/19/97	1	
34872043	09/17/97	09/18/97	9/22/97	1	5	1	3	09/18/97	0	
34894761	09/17/97	09/22/97	10/1/97	5	14	3	10	09/20/97	2	
34928161	09/17/97	09/23/97	9/23/97	6	6	4	4	10/10/97	3	
30280276	10/08/97	10/9/97		1		1		10/10/97	0	
30361448	10/08/97	10/9/97	10/14/97	1	6	1	4	10/10/97	0	
35238261	10/08/97	10/9/97		1		1		10/13/97	0	
35268493	10/08/97	10/9/97	10/10/97	1	2	1	2	10/13/97	0	
35229001	10/09/97		10/15/97		6		4	10/13/97		
35249022	10/09/97	10/15/97		6		4			3	FOC via phone 10-13
35229001A	10/09/97	10/13/97	10/15/97	4	6	2	4	10/13/97	1	
34553599	10/10/97	10/14/97	10/15/97	4	5	2	3	10/14/97	1	
35188165	10/10/97	10/11/97	10/13/97	1	3	1	1	10/14/97	0	
35300574	10/10/97		10/15/97		5		3	10/14/97		
30369763	10/13/97							10/15/97		Never received status, resent manual order 11-07
34899797	10/13/97							10/15/97		Verbal FOC, LCI Customer as of 10-5-97
35108121	10/13/97							10/15/97		Clarification 10-14, on hold, BTN disconnected, refer to sales
35177076	10/13/97							10/15/97		Never received status, resent manual order 11-07
35286777	10/13/97							10/15/97		Never received status, resent manual order 11-07
30317136-01	10/13/97							10/14/97		MAC, didn't understand TCIF code, put into clarification, shouldn't of
34755068-05	10/13/97							10/14/97		MAC to remove feature, verbal FOC
34475510	10/15/97							10/15/97		LCI customer as of 9-26

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LCI International
BellSouth EDI Analysis

35289364	10/15/97		11/5/97		21		15	10/17/97			
35350052	10/15/97	10/16/97	10/17/97	1	2	1	2	10/17/97	0		
35355964	10/15/97	10/16/97	10/21/97	1	6	1	4	10/17/97	0		
35369635	10/15/97	10/17/97	10/17/97	2	2	2	2	10/17/97	1		
9549713001	10/15/97							10/17/97		Receive clarification 10-28, LCI Customer as of 7-20-97	
7045883238	10/16/97		11/4/97		18		13	10/20/97			
9013870272	10/16/97	10/17/97	10/23/97	1	7	1	5	10/20/97	0		
9196620227	10/16/97	10/17/97	10/20/97	1	4	1	2	10/20/97	0		
30350502	10/17/97	10/17/97	10/22/97	1	5	1	3	10/21/97	0		
30366769	10/17/97	10/17/97	10/21/97	1	4	1	2	10/21/97	0		
35380491	10/17/97	10/23/97	10/27/97	6	10	4	6	10/21/97	3		
7043930448	10/17/97	10/17/97	10/21/97	1	4	1	2	10/21/97	0		
35012322	10/20/97							10/23/97		Verbal FOC LCI Customer as of 9-30	
35372616	10/20/97							10-23 - 11-5		Clarification 10-30, resubmit manual 10-31, verbal FOC as of 11-4	
35380128	10/20/97							10-23 - 10-31		Clarification 10-27, resubmit manual 10-28, verbal FOC as of 10-30	
35382657	10/20/97							10/23/97		Clarification 10-27, resubmit manual 10-28, verbal FOC as of 10-30	
35382735	10/20/97							10-27 - 11-3		Received clarification, already LCI customer	
7043992727	10/20/97							10/23/97		Received clarification, already LCI customer as of 9-10	
30282374	10/21/97	10/29/97		8		6		10/24/97	5		
35349430	10/21/97		10/27/97		6		4	10/24/97			
35390038	10/21/97	10/23/97	10/28/97	2	7	2	5	10/24/97	1		
7043924624	10/21/97							10/24/97		Verbal FOC as of 11-4	
7043927883	10/21/97							10/21/97		Verbal FOC as of 10-28	
7043929661	10/21/97							10/24/97		Received clarification 11-5, resent manual 11-5	
30370747	10/22/97							10-24 - 10-31		Clarification 10-28, sent manual order 10-28, verbal FOC 10-31	
35422529	10/22/97	10/27/97	10/28/97	5	6	3	4	10/27/97	2		
4043666688	10/22/97							10/27/97		LCI Customer as of 9-10	
7043336233	10/22/97		11/3/97		11		8	10/27/97			
7043348169	10/22/97		11/3/97		11		8	10/27/97			
7043448462	10/22/97							10/27/97		BS never found order, we received 855, resent manual order 11-5	
7043992496	10/22/97							10/27/97		LCI Customer as of 9-10	
7043994315	10/22/97							10/27/97		LCI Customer as of 9-10	
30369918	10/23/97							10-28-11-5		BS never found order, resent manual 11-1, Faxed FOC 11-3	
30370464	10/23/97	10/29/97	10/30/97	6	7	4	5	10/28/97	3		
7043324834	10/23/97		11/3/97		10		7	10/28/97			
7043722005	10/23/97							10/28/97		BS never found order, resent manual 11-7	
7043930190	10/23/97	11/4/97	11/4/97	12	11	8	8	10/28/97	7		
7045419080	10/23/97	11/3/97	11/4/97	12	11	7	8	10/28/97	6		
7048271009	10/23/97	11/4/97	11/4/97	12	11	8	8	10/28/97	7		
9544758800	10/23/97							10/28/97		Received manual FOC 11-7-97, nothing via EDI	
9545818554	10/23/97							10/28/97		Received manual FOC 11-7-97, nothing via EDI	
30370647	10/24/97	10/27/97	10/29/97	3	5	1	3	10/29/97	0		
30371739	10/24/97	10/25/97	10/30/97	1	6	1	4	10/29/97	0		
35422110	10/24/97	10/27/97	10/29/97	3	5	1	3	10/29/97	0		
35422745	10/24/97	11/4/97		12		7		10/29/97	6		
35422760	10/24/97		11/4/97		10		7	10/29/97			
35422766	10/24/97							10/29/97		BS never found order, resent manual 11-7	
				EDI PROCESS		MANUAL PROCESS					
				ORDERS	PERCENT						

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Summary Data:

Summary Data:		COMPLETED	COMPLETE
TOTAL ORDERS	89	59	66.3
August Orders(Partial Month)	9	9	100.0
September Orders	20	18	90.0
October Orders	65	32	49.2
AVERAGE MONTHLY RESPONSE DAYS (855)			
August	5.2		
September	3.6		
October	2.7		

DECLARATION 2

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ON BEHALF OF LCI INTERNATIONAL TELECOM CORP.**

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**DECLARATION OF ALBERT D. WITBRODT
ON BEHALF OF LCI INTERNATIONAL TELECOM CORP.**

I, Albert D. Witbrodt, do hereby declare and state:

1. I work for LCI International Telecom Corp. ("LCI") as a Project Manager – EDI Account Executive. In this position, I am responsible for implementing LCI's use of the electronic data interchange ("EDI") interface that BellSouth has made available to competitive carriers for access to BellSouth's operations support systems ("OSS"). I am LCI's principal point of contact with BellSouth for issues and problems that have arisen during LCI's efforts to implement BellSouth's EDI interface. I have a Bachelor of Science degree in Computer Science from Michigan State University. I have over 20 years experience in network computing and data processing, and before joining LCI, I had over three years of experience working with EDI interfaces.

2. LCI began its efforts to implement BellSouth's EDI interface in June of 1997, not long after LCI first began reselling local service in BellSouth's region. It is my understanding that BellSouth makes available the same

electronic interfaces for access to its OSS in every state in its region. The BellSouth EDI applications that LCI currently uses for ordering in several states in BellSouth's region, including Georgia, Florida and North Carolina, is an application called Trusted Link that was developed for BellSouth by a company called Harbinger Corporation.

3. Before BellSouth would permit LCI to begin using the EDI interface for placing orders, BellSouth required LCI to undergo a certification process that involved two steps. The first step was a "connectivity test," which was designed to test the capability of LCI to transmit documents to the value added network (VAN) belonging to Harbinger Corporation. The second step was a test of LCI's capability to generate and submit error-free documents to BellSouth using the EDI interface. I was responsible for overseeing both tests on LCI's behalf. The connectivity test was completed on July 2, 1997. The second phase of the certification process began on July 15, 1997, and was completed on September 25, 1997. LCI has now been authorized by BellSouth to use the EDI interface for all POTS orders.

4. At the beginning of the second phase of BellSouth's certification process, I attended a training session offered by BellSouth on its EDI application. This training session was held in Birmingham, Alabama, and was purportedly offered by BellSouth to train CLEC representatives in the operation of BellSouth's EDI application. This training session was wholly inadequate for that purpose. The Bell South representative who conducted the training had never submitted an actual order across BellSouth's EDI interface in a training session, and thus was not able to address the document or process flows that occur after an initial order has been submitted. Nor were we able at this training session to submit our own orders across BellSouth's EDI interface. The computers

BellSouth provided for our training were stand-alone systems; they were not even connected to BellSouth's OSS. Thus, the only training we received was on how to fill out a basic electronic order form, which in EDI parlance is known as an "850." The training session did not address other key EDI documents, including order acknowledgments (997s), order confirmations (855s), and completion notices (865s), nor did it address how to handle such occurrences as order corrections and order cancellations while an order was pending in BellSouth's systems.

5. There were numerous problems that occurred during the phase of the certification process in which LCI was submitting test orders. For example, although LCI followed the test data published in BellSouth's implementation guides, some orders were rejected by BellSouth. There were also test orders on which no order acknowledgements were received back from BellSouth, even though such acknowledgments are required by EDI standards. These (and other) problems were documented in a letter sent to BellSouth on August 7, 1997, a true and correct copy of which is attached hereto as Exhibit A. Many of these same problems have plagued LCI in its use of the EDI interface for live production orders, and are addressed in a separate affidavit filed by Beth Rausch of LCI.

6. The inadequacy of BellSouth's training for CLECS such as LCI on the BellSouth EDI has been compounded by the fact that BellSouth does not appear to have sufficient personnel who have been fully trained in EDI to respond to problems that inevitably occur in the implementation of EDI. BellSouth has thus far failed to provide LCI with a single point of contact to whom we can address the problems and issues that have arisen in use of the EDI application for live orders. We frequently have to make numerous telephone

calls to several different BellSouth representatives in an effort to resolve problems and obtain answers to questions that we have. This is a process that can and does take days to accomplish. Moreover, most of the BellSouth representatives to whom we are referred are unable to provide answers or solutions to the problems and issues we have raised, and readily admit that they are unfamiliar with the workings of BellSouth's EDI processes.

7. The problems that have arisen in live production have included system outages that interfered with the timely exchange of electronic responses; excessive service order response times in BellSouth's Resale Service Center (known as the "LCSC"); lost/misplaced documents in the LCSC; and the inability to locate a knowledgeable person in the LCSC to assist in EDI problem resolution. Due to the inability of LCI to determine the status of document exchanges, service orders and to perform problem determination in a live production environment, BellSouth and LCI held a telephone conference call to identify problem determination procedures. There were no established BellSouth procedures. LCI's objective in the conference call was to establish a schedule so that the parties could determine if a transmission error or transmission delay had occurred in the EDI document exchanges between BellSouth and LCI. That objective was accomplished with BellSouth committing to established time intervals for document exchanges. For example, BellSouth committed in that conference call to provide firm order confirmations (855s) within 24 hours after submission of LCI's orders. To date, BellSouth has met that commitment on only a small percentage of LCI's orders. On several orders, LCI did not receive any firm order confirmation via BellSouth's EDI.

8. CLECs such as LCI do not have equal access to BellSouth's OSS just because BellSouth has an EDI interface over which orders can be

submitted. BellSouth must provide an EDI that complies with industry standards, and it must provide adequate training to CLECs in the use of that interface, as well as access to personnel who are knowledgeable about the EDI process and interfaces and who can timely respond to issues and problems as they arise. BellSouth has not done that to date. Consequently, LCI has not been able to obtain access to BellSouth's OSS that is equal to that which BellSouth provides to its own retail operations.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. Executed this 21st day of November 1997 in Dublin, Ohio.


Albert D. Witbrodt

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